

## ~~OEPA~~ Comments on Expanded Phase II MIP Sampling Plan

September 8, 2013

- General Comment – Sampling Plan should contain the rationale for the MIP boring locations. Need to finalize Phase III Scoping Memo (call it expanded phase II scoping memo), or include rationale in SAP? will rationale be in RI report? August 29<sup>th</sup> minutes, say “The discussions and rationale of additional field sampling will be included in subsequent work plans.” But it is not in the MIP SAP. Need to tie MIP with potential data needs and proposed investigations (table 1 in scoping memo)

Process – conduct MIP (identify location and depth of elevated VOCs). Collect soil samples if significant MIP results are observed. Conduct GW Waterloo samples based on MIP results.

However, Phase III scoping memo for Hobart Cabinet, states that soil borings will be collected within the building in the degreaser area and inside the loading dock garage structure  
Will these be collected? In addition, MIP borings will be collected.

This is because significant soil contamination has been detected near the loading dock at Hobart during the Phase I and II. Purpose of soil borings is to characterize lateral extent and depth of soil potentially capped/excavated/treated and evaluate treatment parameters.

The way the MIP SAP reads is that based on MIP and HRSC groundwater, soil samples MAY BE COLLECTED. For Hobart, soil samples should be collected to FURTHER CHARACTERIZE EXTENT OF SOIL CONTAMINATION IN THIS AREA

Hobart – Will soil borings be collected within

However, on page 2 of MIP SAP, third bullet indicates that surface/subsurface soil samples MAY BE COLLECTED DEPENDING ON RESULTS OF MIP AND HRSC groundwater investigations.

- Section 3.1 MIP Investigation
- - Page 5, “entire group of initial borings completed at each investigation area, and the results will be evaluated before any step-out borings will be conducted.” What is the sequence? MIP borings at 10 E Main, team evaluates results, then step-out? Or all MIP borings done at ALL locations, then team evaluates response, then step-out? Don’t want subcontractor to wait on site until a decision on step out is made.

- What MIP intervals (feet) will be used to meet objective of MIP sampling? Will MIP be advanced One foot, two feet, etc? Will this interval provide greater resolution of MIP readings?
- 10 E. Main - Proposed 2 contingency borings at 10 E Main should increase. Will likely need step out at 107-I and two contingent borings are not enough. Why are no MIP borings proposed along Main at MAI-1, where Phase I screening sample showed PCE at 330? What depth was 330 ppb PCE detected at? Phase I soil sample detected PCE at 15ppb at 12-14 foot depth.
- Page 2 of Scoping Memo states "soil samples will be collected if significant MIP results are observed" If
- 5 Initial borings on west side of Walnut are on City property? Do we have access from City? 3 on east side of Walnut are in parking lot behind the Cabinet shop. Need to get access? If need to step out, who do we need to get access now instead of waiting until initial round of MIP is completed. If step out, need to get access from police station ?
- If significant VOCs are not observed, no soil samples will be collected. Will groundwater (will 2 VAS transects along west and east sides of Walnut still be done to characterize groundwater concentrations)? Should be yes. What if VOCs are not significant, will soils samples still be collected and analyzed for TOC and grain size? Necessary for evaluating remedial alternatives?
- Section 3.3 Decontamination Procedures
  - How will subcontractor decontaminate MIP? Don't see decon procedures in SOP. Only see Chemical Response Testing in the SOP, which is done to ensure the equipment is working properly (is operating consistently).
  - Will direct push subcontractor decont drilling equipment in accordance with procedures in Phase I SAP ) alconox, tapwater rinse, final distilled water rinse) as is mentioned in the first paragraph?